

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

**JOINT MOTION FOR LIMITED AGREED PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c), Plaintiff Terry Lynn King and Defendants Commissioner Frank Strada and Warden Kenneth Nelsen jointly move for entry of the attached Limited Agreed Protective Order to facilitate the exchange of information that may aid Plaintiff in drafting an amended complaint.

The Commissioner recently signed a new lethal injection protocol. The Department of Correction has released a redacted version of the lethal injection protocol to the public, but it has withheld some information in the protocol as confidential. In the interest of judicial economy, Defendants are willing to provide Plaintiff an unredacted copy of the protocol under conditions sufficient to protect the confidentiality of the redacted information. The parties have conferred and have mutually agreed to the terms of the proposed order attached to this motion. Pursuant to the parties' agreement and Fed. R. Civ. P. 26(c), the parties request that the Court enter the attached Limited Agreed Protective Order.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I certify that on the 28th day of February, 2025, a copy of the foregoing was filed and served via the Court's CM/ECF system on the following:

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